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May 19, 2022

**VIA ELECTRONIC CASE FILING**

Honorable Cheryl L. Pollak  
Chief Magistrate Judge  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11202

**RE: *Status Report – Edmondson, et al. vs. Keith Raniere, et al., No. 1:20-cv-00485***

Dear Judge Pollak:

Pursuant to the Court's Order at the conference on May 5, 2022 (docketed as a Minute Entry on May 9, 2022), Plaintiffs' counsel and counsel for non-party Suneel Chakravorty have met and conferred about the entry of a protective order related to the affidavit and photographs ("Chakravorty Materials"), which Mr. Chakravorty submitted to the Court on April 25, 2022. (See Order, ECF No. 164).<sup>1</sup> The status of the meet and confer process is that Plaintiffs' counsel awaits a response from Mr. Chakravorty's counsel regarding Mr. Chakravorty's position on the protective order and requests one additional week, until Friday, May 27, 2022, for the joint submission of a stipulated protective order or a final status report regarding the same.

On May 5, 2022, Plaintiffs' counsel emailed Mr. Chakravorty's counsel and offered to prepare a stipulated protective order. On May 12, 2022, Mr. Chakravorty's counsel informed Plaintiffs' counsel that Mr. Chakravorty's affidavit contains information which Mr. Chakravorty is reluctant to disclose and which he may wish to redact prior to production. Plaintiffs' counsel stated that they would not agree to the redaction of any information in the affidavit provided to them, but that they remained willing to negotiate a protective order prohibiting disclosure of confidential information to third parties. Mr. Chakravorty's counsel said she would confer

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<sup>1</sup> Counsel for Defendants Clare and Sara Bronfman appeared at the May 5, 2022 conference and stated that the conference concerned an issue in which their clients do not have a direct interest. Plaintiffs acknowledge that they may not unilaterally withhold non-party discovery from Defendants, absent a Court order. Assuming Mr. Chakravorty agrees to negotiate an appropriate protective order, Plaintiffs will consult with Defendants prior to filing the proposed order so Defendants' interests are not prejudiced.

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further with her client. On May 17, 2022, Plaintiffs' counsel followed up with Mr. Chakravorty's counsel, asking if she could confirm her client's position on the affidavit. On May 18, 2022, Mr. Chakravorty's counsel responded that, while she believed the matter was resolvable, she "d[id] not have a definitive answer yet."

This morning, Plaintiffs' counsel conferred with Mr. Chakravorty's counsel, who confirmed that she will be able to articulate her client's position soon and proposed one additional week to conclude the meet and confer process. Therefore, counsel for Plaintiffs respectfully request that the Court enter an Order setting a deadline of Friday, May 27, 2022, for Plaintiffs and Mr. Chakravorty to jointly submit either a stipulated protective order governing production of the Chakravorty Materials or, if no agreement is reached, a report to the Court setting forth their respective positions.

Respectfully yours,



Neil L. Glazer

cc: Deborah J. Blum, Esquire (via ECF)  
All parties (via ECF)